



October 23, 2017

Ms. Marlene H. Dortch  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: CG Docket No. 03-123 - Telecommunications Relay Services

Dear Ms. Dortch:

On October 23, 2017, the undersigned and Roger Fleming of Northfork Strategies met with Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel, on behalf of IDT Telecom, Inc. ("IDT"). We discussed the information and analysis contained in IDT's Petition for Rulemaking filed in the above-referenced docket on November 25, 2015.<sup>1</sup>

IDT's petition requests that the Commission issue a Notice of Proposed Rulemaking in which the Commission would seek comment on the impact of expanding the contribution base for the Telecommunications Relay Service ("TRS") by including intrastate telecommunications revenue as well as interstate and international revenue. We noted that such an expansion would not only result in a lower TRS Fund contribution factor but it would also create more stability for the fund by introducing more predictability and less volatility in the factor as it is periodically re-set. We observed that IDT's proposal has received support from relay service users and advocates for the deaf community before the FCC and in Congress and that Section 225(b)(2) of the Communications Act provides the Commission with authority to take favorable action on IDT's proposal.

Please feel free to contact me with any questions or concerns regarding this filing.

Sincerely,

A handwritten signature in cursive script that reads 'Colleen Boothby'.

Colleen Boothby  
Counsel, IDT Telecom, Inc.

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<sup>1</sup> IDT Telecom, Inc., Petition for Rulemaking, CG Docket No. 03-123 (filed Nov. 25, 2015) ("IDT Petition").